

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA

v.

CONSTANTINESCU, *et al.*

Defendants.

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Case No. 4:22-cr-612

The Honorable Andrew S. Hanen

**United States' Response to Defendant Cooperman's Motion to Travel**

The United States, by and through its undersigned counsel, responds to Defendant Cooperman's March 10, 2023 motion to travel to Thailand and Myanmar, "Motion" (Doc. No. 203). The Court should deny the Motion.

The Motion is Defendant Cooperman's second motion in less than as many months to travel internationally after his previous request was summarily denied (Doc. No. 131). As the Court ruled on February 16, 2023 upon Defendant's Cooperman's prior motion to travel to Mexico:

It's no dilemma. He's not going. . . . He's been indicted. He's under bond. He's not leaving the country on my say so. If you don't like that answer, you can go ask Judge Hanen, but I'm not allowing him to leave the country.

2/16/23 Tr. at 12-13 (Ex. 1). The Court then denied Defendant Cooperman's request, which the Court coined "the second easiest" issue of the hearing. *Id.* at 13.

Defendant Cooperman does not even try to provide any justification for why an individual with significant means, foreign citizenship, and a potential significant term of incarceration upon conviction for the charged offenses should be allowed to travel freely internationally. His throw-away line about his "perfect standing" with pre-trial may justify travel to Atlantic City, which the

United States does not oppose, but in no way ameliorates the legitimate risk of flight if allowed to travel internationally. The Court should deny the Motion.

Dated: March 10, 2023

Respectfully submitted,

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